

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the
Central District of California

____ Southern ____ Division



Rhonda Johnson Pawnell

Case No. 8:24-cv-01362-DOC-KES

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

-v-

Sir Lucian grainge
Shawn Carter
Robyn Fenty and Sean combs

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

| | |
|--------------------|---------------------------------------|
| Name | <u>Rhonda Johnson Pawnell</u> |
| Street Address | <u>7060 Park Pl</u> |
| City and County | <u>East St Louis St. Clair County</u> |
| State and Zip Code | <u>Illinois, 62203</u> |
| Telephone Number | <u>714-471-5284</u> |
| E-mail Address | <u>Johnson498.rj@gmail.com</u> |

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

| | |
|---------------------------|----------------------------|
| Name | Sir Lucian Grainge |
| Job or Title (if known) | CEO/ Universal Music Group |
| Street Address | 2220 Colorado Ave |
| City and County | Santa Monica |
| State and Zip Code | CA 90404 |
| Telephone Number | 310-865-4000 |
| E-mail Address (if known) | Royaltyhelp@umusic.com |

Defendant No. 2

| | |
|---------------------------|---------------------------|
| Name | Shawn Carter |
| Job or Title (if known) | Artist/ Label UMG |
| Street Address | 2220 Colorado Ave |
| City and County | Santa Monica, L.A. County |
| State and Zip Code | CA 90404 |
| Telephone Number | 310-865-4000 |
| E-mail Address (if known) | Royaltyhelp@umusic.com |

Defendant No. 3

| | |
|---------------------------|---------------------------|
| Name | Robyn Fenty |
| Job or Title (if known) | Artist @UMG |
| Street Address | 2220 Colorado Ave |
| City and County | Santa Monica, L.A. County |
| State and Zip Code | CA 90404 |
| Telephone Number | 310-865-4000 |
| E-mail Address (if known) | Royaltyhelp@umusic.com |

Defendant No. 4

| | |
|---------------------------|--|
| Name | Sean Combs |
| Job or Title (if known) | Artist/ CEO Bad Boys Records a UMG Company |
| Street Address | 2220 Colorado Ave |
| City and County | Santa Monica, L.A. County |
| State and Zip Code | CA 90404 |
| Telephone Number | 310-865-4000 |
| E-mail Address (if known) | Royaltyhelp@umusic.com |

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Royalties were misappropriated and are not being distributed to the Plaintiff. The Defendants have their names on all the outlets for the Plaintiff to receive her royalties. Copyright clearly states that the Owner of the Songs are the rights of the musical recording and the Songwriter. Defendants have ignored

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) Rhonda Johnson Powell, is incorporated under the laws of the State of (name) California, and has its principal place of business in the State of (name) California.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Shawn Carter, is a citizen of the State of (name) California. Or is a citizen of (foreign nation) n/a.

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)



Federal question



Diversity of citizenship

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B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) ~~Rhonda Johnson-Pawnet~~, is incorporated under the laws of the State of (name) ~~California~~, and has its principal place of business in the State of (name) ~~California~~.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Robyn Fenty, is a citizen of the State of (name) California. Or is a citizen of (foreign nation) n/aA.

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b. If the defendant is a corporation

The defendant, (name) ~~Shawn Carter~~ Universal Music Group, is incorporated under the laws of the State of (name) California, and has its principal place of business in the State of (name) California.
Or is incorporated under the laws of (foreign nation) n/a, and has its principal place of business in (name) Universal Music Group.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

The Company UMG is the top label that is responsible for holding client records. But at times these records get into the wrong hands and are not credited to the Author of the works as in this case. Plaintiff is seeking relief and court costs in the amount of 1 million dollars from the Defendants for damages to the Plaintiff's Recordings and Universal Music Group Portal.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The Plaintiff is the person that brought the three artists to Universal in a way so that they would be able to perform songs in her Songfile. She wrote and recorded songs for Shawn Carter for Beyonce in 83. Crazy in Love, Me myself and I. Plaintiff did not give to Beyonce but it is in her name. Once in a Lifetime Beyonce did not like. But in 2009 I looked it up on Youtube and it had 1009 view so Plaintiff called in to soundexchange or BMI to claim it. Plaintiff got a ISNI international soundrecording number to it. In 2020 Plaintiff looks up the ISNI number only to find its been copyrighted by Beyonce and set to be in a Movie Cadillac Records

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The Plaintiff is seeking Damages and monetary in the amount of 100,000,000.00 in total for all Defendants. This is a verbal agreement among Plaintiff and UMG in 2000.

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b. If the defendant is a corporation

The defendant, (name) Robyn Fenty Sw Lucian Corning is incorporated under the laws of the State of (name) California, and has its principal place of business in the State of (name) California.
Or is incorporated under the laws of (foreign nation) USA, and has its principal place of business in (name) Universal Music Group.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

The Company UMG is the top label that is responsible for holding client records. But at times these records get into the wrong hands and are not credited to the Author of the works as in this case. Plaintiff is seeking relief and court costs in the amount of 1 million dollars from the Defendants for damages to the Plaintiff's Recordings and Universal Music Group Portal.

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The Plaintiff is seeking Damages and monetary in the amount of 100,000,000.00 in total for all Defendants. This is a verbal agreement among Plaintiff and UMG in 2000.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 07/18/2024

Signature of Plaintiff

Rhonda Johnson Pawnell

Printed Name of Plaintiff

Rhonda Johnson Pawnell

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address